

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

JAMES M. DUNLAP,

Plaintiff,

Civil Action 2:11CV272-AWA-DEM

COTTMAN TRANSMISSIONS SYSTEMS, LLC,

And

TODD P. LEFF,

Defendants.

MOTION TO WITHDRAW AND FOR EXTENSION OF APPLICABLE DEADLINES

COMES NOW counsel for James M. Dunlap, and of and for his Motion states as follows;

1. Counsel's relationship with Plaintiff has deteriorated to the point that counsel fears further representation will not be effective..
2. Plaintiff has complained about counsel's handling of the case and seeks to take actions either potentially damaging to Plaintiff's case, or irrelevant to it.
3. This Court's deadline for responding to Defendant's Motion for Summary Judgment is July 19, 2016 and counsel now believes he may have a conflict regarding that matter.
4. Plaintiff should be granted an extension of the Motion for Summary Judgment response and other deadlines to allow for the selection of new counsel.

WHEREFORE, W. Greer McCreedy, II, respectfully prays that this Court grant him leave to withdraw as counsel for the Plaintiff and allow Plaintiff an extension of time to respond to Defendant's Motion for Summary Judgment.

By: /s/ W. Greer McCreedy, II
W. Greer McCreedy, II

CERTIFICATE OF SERVICE

I hereby certify that I will electronically transmit today, this 18th day of July, 2016, by email a true copy of the foregoing Motion to Withdraw as Counsel and Extension of Time to Defendants' Counsel at JRubinger@plavekoch.com and to BReed@plavekoch.com and to Plaintiff at AamcoTransmissions78@gmail.com and miltondunlap@netzero.com and by pre-paid U.S. mail, certified, first-class, return receipt requested, at 1312 DeBree Avenue, Norfolk, VA 23517.

/s/ W. Greer McCreedy, II
W. Greer McCreedy, II

W. Greer McCreedy, II - VSB #27681
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